



RE: Lockheed Martin Information

MOORE Fredrick to: Christy Brown

Cc: Carla Fisher, "DRUBACK Lissa", VROOMAN Gary L, Mary
Queitzsch, Mike Slater, Lisa McArthur

02/05/2013 10:43 AM

Hi Christy,

My understanding from the meeting was that contemporaneous with me compiling a RCRA landfill timeline you would submit documentation from among the 47 boxes supporting Region 10's statement that there might be treatment at the RCRA landfill in 2002 and that maybe there was unpermitted treatment. Such information would have been useful to me in assessing whether DEQ had missing documentation or we had such or similar documentation and needed to clarify what occurred. Lisa MacArthur stated Region 10 would get to me the documentation and Region 10 receiving the DEQ RCRA landfill timeline beforehand was not precursor condition.

I learned yesterday that Mary talked with Gary, Gary then talked with Lissa who then talked with me. So the chain of communication here might have distorted the message received, but it is my understanding that Mary told Gary getting me the information I requested is not a priority for Region 10 right now.

Just to be clear, I'm not asking Region 10 to check the CD I sent you with the Lockheed information request response and insure it has all the documents in your 47 boxes. Rather, it was intended to be an aid that if you know where the documents are within the 22 sections of how the information was compiled, you could simply, and hopefully, find it on the CD and point to me where within the CD the documents resides. ARCADIS informed me the information in the boxes is arranged as the information on the CD. If you saw a document in the Lockheed response that applies to my information request but don't know where it is now, that's a problem, I guess.

Regardless, I have finished the timeline and it's undergoing management review, so it should be forthcoming.

Cheers, Fredrick

From: Brown.Christy@epamail.epa.gov [mailto:Brown.Christy@epamail.epa.gov]
Sent: Monday, February 04, 2013 2:58 PM
To: MOORE Fredrick
Cc: Fisher.Carla@epamail.epa.gov; DRUBACK Lissa; VROOMAN Gary L; Queitzsch.Mary@epamail.epa.gov

Subject: Re: Lockheed Martin Information

Hi Fredrick. Apologies for the delayed response, I've been out with the flu.

Our understanding was that ODEQ would be pulling the timeline together and EPA would review that information to see whether any relevant documents were missing. That will minimize the amount of copying that will be needed. It appears you are looking at the correct dates -- 2002 through the present. My notes indicate that you would have the timeline together by the middle of February.

We received, literally, 47 boxes of records that were submitted in response to EPA's information request. I'm sure you understand that there is no way for us to confirm whether you have a complete copy.

Christy Ahlstrom Brown
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▼ MOORE Fredrick ---01/23/2013 03:07:01 PM---Hi Christy, I appreciate your availability to point to the records that EPA is basing their position

From: MOORE Fredrick <MOORE.Fredrick@deq.state.or.us>
To: Christy Brown/R10/USEPA/US@EPA,
Cc: Carla Fisher/R10/USEPA/US@EPA, DRUBACK Lissa <DRUBACK.Lissa@deq.state.or.us>, VROOMAN Gary L <Gary.L.VROOMAN@state.or.us>
Date: 01/23/2013 03:07 PM
Subject: Lockheed Martin Information

Hi Christy, I appreciate your availability to point to the records that EPA is basing their positions on.

Because you have boxes of hard copies, and I have a DVD, I am making a copy of the DVD and sending you a copy. That way, maybe you can point to where on the DVD are the relevant documents. It will also insure, maybe, that what is on the DVD is complete with the information that you received.

So to start, here's a request for the following documents you might have:

1. EPA Statement: Treatment activity started at the RCRA landfill in 2002.

What documents suggest treatment activity, or some sort of activity, started in 2002? We are aware of the following activities in 2002 –

- A leachate pilot treatment test done from Dec. 2001 to Mar. 2002 done within a poly tank next to the CERCLA tank and presumably testing the CERCLA leachate.
- A meeting between ARCADIS and DEQ in July to discuss CERCLA pilot test results with a new treatment method. If a new treatment method, RCRA leachate would be mixed with CERCLA leachate, but such treatment would be away from the RCRA landfill.
- Gas sampling occurred at the RCRA landfill and results were reported in Aug. 2002.
- ARCADIS proposed to install lightning rods at the RCRA gas vents. Actual installation occurred in 2003 per Permit Condition V.J. Does EPA consider this treatment?
- DEQ agreed to biotreatment of RCRA leachate in the CERCLA tank (once RCRA leachate is placed in the CERCLA tank, NPDES standards apply).
- In Oct. 2002 EPA, DEQ and ARCADIS modify the Consent Decree to allow biotreatment of leachate. Treatment of RCRA leachate outside the CERCLA tank is not allowed.

2. EPA Statement: A (treatment) activity occurred, but was not permitted.

What activity was not permitted? DEQ considers that any activity allowed per a permit modification, temporary authorization, included per Permit Condition II.S or notified as a planned change per Permit Condition I.E.10 are permitted changes.

3. Any documents that you know of that shows something is amiss, confusing or simply does not purport to RCRA standards, please note those, too.

Thanks, Fredrick

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